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February 3, 2006

BY ECF AND BY HAND

Honorable Charles P. Sifton
United States District Judge
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Honorable Nina Gershon
United States District Judge
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Weiss et al. v. National Westminster Bank Plc,
05-CV-4622 (CPS) (KAM)

Dear Judge Sifton and Judge Gershon:

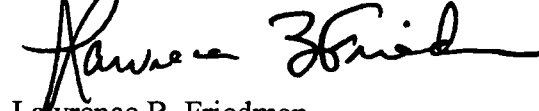
I am responding on behalf of defendant National Westminster Bank Plc ("NatWest") to the February 2 letter from Kevin Walsh, counsel to Arab Bank plc ("Arab Bank"), concerning Arab Bank's improper attempt under Federal Rule of Civil Procedure 42(a) to secure the withdrawal of the Weiss lawsuit against NatWest from Judge Sifton's docket on the ground that it purportedly is related to seven lawsuits against Arab Bank, and then to consolidate all eight lawsuits on Judge Gershon's docket.

Mr. Walsh's presentation is difficult to understand fully, but it appears to me that one incontrovertible point defeats Arab Bank's attempt to conflate and collapse the two independent forms of relief – reassignment and consolidation – that it seeks. Under the Court's rules, Arab Bank first needs to ask Your Honors to agree to the reassignment of the Weiss lawsuit from Judge Sifton to Judge Gershon before Arab Bank can seek to have all of these lawsuits consolidated. The applicability of the second sentence of Rule 50.3(e) of this Court's Rules for the Division of Business Among District Judges (to which Mr. Walsh does not refer) could not be more clear: "The failure to assign related cases appropriately shall be corrected only by agreement of all the judges to whom the related cases are assigned; if they agree, they may transfer the later-filed cases as provided in paragraph (e), and notify the clerk of that action." If and only if Your Honors decide that the Weiss lawsuit should be reassigned, then and only then

Honorable Charles P. Sifton
Honorable Nina Gershon, p. 2

may Arab Bank seek to consolidate the Weiss lawsuit with the seven Arab Bank lawsuits.

Respectfully,

A handwritten signature in black ink, appearing to read "Lawrence B. Friedman", written in a cursive style.

Lawrence B. Friedman

cc: All counsel in the Arab Bank and Weiss lawsuits (by facsimile and regular mail)